Communications Workers of America AFL-CIO West Virginia Area Huntington Square, Suite 1212 900 Lee Street Charleston, West Virginia 25301 (304) 342-2023



April 1, 2010

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Room TW-A325 Washington, DC 20554

RE: Transfer of Verizon's local exchange and long distance business to Frontier Communications

Dear Secretary Dortch,

Attached are letters from twenty-eight West Virginia County Commissions that wrote letters concerning the proposed sale of Verizon's landlines to Frontier Communications

Ten of the letters that were sent from county commissions strongly oppose the sale, nine wrote letters of "comment" and *only two letters* were designated as being in "support" of the sale.

A summary of all of the letters from County Commissioners that were sent to the West Virginia Public Service Commission between October 2009 thru March 2010 are attached.

Experts have testified and compelling evidence has been submitted that the proposed sale is not in the public interest.

Opinion surveys, letters from West Virginia Senators and Delegates to the Public Service Commission and to the Governor, public petitions and these letters from County Commissioners show that the public is overwhelmingly opposed to the deal. It's obvious to everyone that approving this transaction is too risky because the dangers far outweigh any purported public interest benefits. Once again, we urge the Federal Communications Commission not to approve the sale.

Sincerely,

Elaine A. Harris

CWA International Representative

Elais a. Havis

Letters from County Commissions to the Public Service Commission

(As of March 30, 2010)

West Virginia County Commissions that wrote "protest" letters opposing the sale

Wirt County	(October 20, 2009)	Marion County	(January 12, 2010)
Monroe County	(November 13, 2009)	Fayette County	(February 2, 2010)
Lincoln County	(December 3, 2009)	Logan County	(February 8, 2010)
Roane County	(December 11, 2009)	Harrison County	(March 4, 2010)
Boone County	(January 5, 2010)	Mineral County	(March 9, 2010)

West Virginia County Commissions that wrote "comment" letters concerning the sale

Wood County	(November 2, 2009)	Randolph County	(December 17, 2009)
Jackson County	(November 19, 2009)	Nicholas County	(December 18, 2009)
Mason County	(December 3, 2009)	Putnam County	(December 22, 2009)
Summers County	(December 7, 2009)	Hancock County -	Office of Technology and
Cabell County	(December 10, 2009)	Communications	(January 8, 2010)

West Virginia Commissions that wrote "support" letters concerning the sale

Grant County (January 13, 2010) Raleigh County (January 11, 2010)



Harrison County Commission

CLARKSBURG, WEST VIRGINIA 26301 304-624-8500 FAX (304) 624-8673 COMMISSIONERS
FRANK "CHUNKI" ANGOTTI
BERNIE FAZZINI
RONALD R. WATSON

HARRISON COUNTY COURT HOUSE

March 4, 2010

Ms. Sandra Squire, Executive Secretary
Public Service Commission of West Virginia
201 Brooks St.
Charleston, WV 25301

NA PUBLIC SERVICE OCCUPANCE OFFICE OF

Re:

Case No. 09-0871-T-PC

Transfer of Verizon's local exchange and long distance business in West Virginia to Frontier Communications

Dear Executive Secretary Squire:

By this letter, and on behalf of the citizens of Harrison County, West Virginia, we are informing you that we are opposed to Verizon's proposed transfer of its local exchange and long distance business in West Virginia to Frontier Communications.

Our opinion is based on voluminous input from our constituency in Harrison County, as well as the results of serious research regarding the matter. We have listened to both sides of the issue in open meetings at the Harrison County Commission. We believe that to allow this transfer would not be in the best interest of the citizens of Harrison County or the entire State of West Virginia.

Furthermore, we believe that it is the duty of the Public Service Commission of West Virginia to reject this transfer and, moreover, to concomitantly exercise its authority in seeing to it that Verizon lives up to its prior commitments made to the citizens of the State of West Virginia. Ve believe any deal structured to allow Verizon to transfer its local exchange and long distance



business in West Virginia to Frontier Communications threatens the jobs of the labor force of both companies and the financial stability of Frontier Communications. It makes no sense whatsoever, in these uncertain economic times, to allow a financially stable company like Verizon to leave the state of West Virginia and breach its prior promise to serve this great State while allowing it to unload those responsibilities to a company that may not be able to meet the same responsibilities. This is in no way a bad comment on the good employees of Frontier Communications but, rather, an educated opinion designed to inform the Public Service Commission of the wishes of our citizens.

Thank you for your consideration in this matter.

Sin cerely,

Frank Angotti, President

Harrison County Commission

Bernard Fazzini, Commissioner

Harrison County Commission

Ron Watson, Commissioner Harrison County Commission COMMESSION

MAR -8 PM 1: 05

Protest Original (s)

RESOLUTION

Proposed Sale of Verizon's landlines to Frontier Commun

WHEREAS: Verizon wants to sale its land line operations in West Virginia along with other states, to Frontier Communications; and

WHEREAS: Out of the 14 states, West Virginia has the largest number of consumers who will be impacted by the proposed sale; and

WHEREAS: Verizon has completed similar sales of its wire line operations in New England and Hawaii to the detriment of the consumers involved as the purchasing companies are either bankrupt or face bankruptcy; and

WHEREAS: Most regulatory experts have said Frontier does not have the financial or operational capacity to improve service quality or expand access to high speed Internet; and

WHEREAS: Frontier plans to limit its broadband investment to DSL technology instead of fiber optic cable to the home, which is much faster and more dependable; and

WHEREAS: According to the FCC, nearly 60 percent of homes in West Virginia lack broadband access; and

WHEREAS: West Virginia ranks 33rd in the nation in real-time Internet connection speeds; and

WHEREAS: Verizon chose Frontier as a buyer because it can advantage of a tax loophole to avoid paying taxes on its \$3.3 billion profit and, if approved, tax payers will in effect subsidize Verizon abandoning its operations; and

WHEREAS: The West Virginia Consumer Advocate and Public Service Commission staff have urged rejection of the deal.

Therefore, be it resolved: The Boone County Commission calls on the West Virginia Public Service Commission to deny Verizon's petition to sell its properties.

Presented by the

BOONE COUNTY COMMISSION

This 5th day of January , 2010

Atholi Halsteád

President

Mickey Brown Commissioner

Eddie Hendricks Commissioner

Boone County Commission 206 COURT STREET • SUITE 300 MADISON, WV 25130

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AT A REGULAR SESSION OF THE LINCOLN COUNTY COMMISSION OF LINCOLN COUNTY, WEST VIRGINIA, HELD AT THE COURTHOUSE THEREOF, ON THE 3RD DAY OF DECEMBER, 2009 THE FOLLOWING ORDER WAS MADE AND ENTERED:

SUBJECT: RESOLUTION REGARDING THE PROPOSED SALE OF VERIZON'S LANDLINES TO FRONTIER COMMUNICATION

THE FOLLOWING MOTION WAS OFFERED BY THOMAS RAMEY, COMMISSIONER:

WHEREAS, VERIZON WANTS TO SELL ITS LANDLINE OPERATIONS IN WEST VIRGINIA, ALONG WITH 13 OTHER STATES, TO FRONTIER COMMUNICATIONS; AND

WHEREAS, OUT OF THE 14 STATES, WEST VIRGINIA HAS THE LARGEST NUMBER OF CONSUMERS WHO WILL BE IMPACTED BY THE PROPOSED SALE; AND

WHEREAS, VERIZON HAS COMPLETED SIMILAR SALES OF ITS WIRE LINE OPERATIONS IN NEW ENGLAND AND HAWAII TO THE DETRIMENT OF THE CONSUMERS INVOLVED AS THE PURCHASING COMPANIES ARE EITHER BANKRUPT OR FACE BANKRUPTCY; AND

WHEREAS, MOST REGULATORY EXPERTS HAVE SAID FRONTIER DOE NOT HAVE THE FINANCIAL OR OPERATIONAL CAPACITY TO IMPROVE SERVICE OUALITY OR EXPAND ACCESS TO HIGH SPEED INTERNET; AND

WHEREAS, FRONTIER PLANS TO LIMIT ITS BROADBAND INVESTMENT TO DSL TECHNOLOGY INSTEAD OF FIBER OPTIC CABLE TO THE HOME, WHICH IS MUCH FASTER AND MORE DEPENDABLE; AND

WHEREAS, ACCORDING TO THE FCC, NEARLY 60 PERCENT OF HOMES IN WEST VIRGINIA LACK BROADBAND ACCESS; AND

WHEREAS, WEST VIRGINIA RANKS 33RD IN THE NATION IN REAL-TIME INTERNET CONNECTION SPEEDS; AND

WHEREAS, VERIZON CHOSE FRONTIER AS A BUYER BECAUSE IT CAN TAKE ADVANTAGE OF A TAX LOOPHOLE TO AVOID PAYING TAXES ON ITS \$3.3 BILLION PROFIT AND, IF APPROVED, TAXPAYERS WILL IN EFFECT SUBSIDIZE VERIZON ABANDONING ITS OPERATIONS.

THEREFORE, BE IT RESOLVED: THE LINCOLN COUNTY COMMISSION CALLS ON THE WEST VIRGINIA PUBLIC SERVICE COMMISSION TO DENY VERIZON'S PETITION TO SELL ITS PROPERTIES.

7

THE ADOPTION OF THE FOREGOING MOTION HAVING BEEN MOVED

BY THOMAS RAMEY, COMMISSIONER AND DULY SECONDED

BY **CHARLES VANCE.** COMMISSIONER, THE VOTE THEREON WAS AS FOLLOWS:

CHARLES S. MCCANN COMMISSIONER AYE
CHARLES VANCE COMMISSIONER AYE
THOMAS RAMEY, JR COMMISSIONER AYE

WHEREUPON, CHARLES MCCANN, PRESIDENT DECLARED SAID MOTION DULY ADOPTED, AND IT IS THEREFORE ADJUDGED AND ORDERED THAT SAID MOTION BE, AND THE SAME IS HEREBY ADOPTED.

CHARLES S. MCCANN, PRESIDENT LINCOLN COUNTY COMMISSION

CHARLES VANCE, COMMISSIONER LINCOLN COUNTY COMMISSION

THOMAS RAMEY, JR, COMMUSIONER LINCOLN COUNTY COMMISSION

Protest Original (s)

RESOLUTION REGARDING THE PROPOSED SALE OF VERIZON'S LANDLINES TO FRONTIER COMMUNICATIONS

Whereas: Verizon wants to sell its landline operations in West Virginia, along with 13 other states, to Frontier Communications; and

Whereas: Out of the 14 states, West Virginia has the largest number of consumers who will be impacted by the proposed sale; and

Whereas: Verizon has completed similar sales of its wire line operations in New England and Hawaii to the detriment of the consumers involved as the purchasing companies are either bankrupt or face bankruptcy; and

Whereas: Most regulatory experts have said Frontier does not have the financial or operational capacity to improve service quality or expand access to high speed Internet; and

Whereas: Frontier plans to limit its broadband investment to DSL technology instead of fiber optic cable to the home, which is much faster and more dependable; and

Whereas: According to the FCC, nearly 60 percent of homes in West Virginia lack broadband access; and

Whereas: West Virginia ranks 33rd in the nation in real-time Internet connection speeds; and

Whereas: Verizon chose Frontier as a buyer because it can take advantage of a tax loophole to avoid paying taxes on its \$3.3 billion profit and, if approved, taxpayers will in effect subsidize Verizon abandoning its operations.

Therefore, be it resolved: The FAYETTE County Commission calls on the West Virginia Public Service Commission to deny Verizon's petition to sell its properties.

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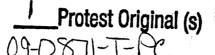
W YA PUBLIC SERVICE
CORMISSION
SECRETARY'S OFFICE

FAYETTE COUNTY COMMISSION POST OFFICE BOX 307 FAYETTEVILLE, WEST VIRGINIA 25840 Similar Toler Desident

Commissioner

Commossioned

3-6



IN THE COUNTY COMMISSION OF LOGAN COUNTY, WEST VIRGINIA:

RECEIVED

IN RE:

RESOLUTION REGARDING THE PROPOSED SALE OF COMMUNICATIONS ARE VERIZON'S LANDLINES TO FRONTIER COMMUNICATIONS ARE

<u>WHEREAS</u>, Verizon wants to sell its landline operations in West Virginia, along with thirteen (13) other states, to Frontier Communications; and

WHEREAS, out of the fourteen (14) states, West Virginia has the largest number of consumers who will be impacted by the proposed sale; and

<u>WHEREAS</u>, Verizon has completed similar sales of its wire line operations in New England and Hawaii to the detriment of the consumers involved, as the purchasing companies are either bankrupt or face bankruptcy; and

<u>WHEREAS</u>, most regulatory experts have said Frontier does not have the financial or operational capacity to improve service quality or expand access to high speed internet; and

<u>WHEREAS</u>, Frontier plans to limit its broadband investment to DSL technology instead of fiber optic cable to the home, which is much faster and more dependable; and

<u>WHEREAS</u>, according to the FCC, nearly sixty (60) percent of homes in West Virginia lack broadband access: and

<u>WHEREAS</u>, West Virginia ranks 33rd in the nation in real-time internet connection speeds; and

<u>WHEREAS</u>, Verizon chose Frontier as a buyer because it can take advantage of a tax loophole to avoid paying taxes on its \$3.3 billion profit and, if approved, taxpayers will in effect subsidize Verizon abandoning its operations;

<u>THEREFORE</u>, **BE IT RESOLVED** that the Logan County Commission calls on the West Virginia Public Service Commission to deny Verizon's Petition to sell its properties.

ADOPTED this the 8th day of February, 2010.

Arthur E. Kirkendoli, President

Danny R. Gødby, Commissioner

Bu



BEHIND THE SADDLE IS THE BIRTHPLACE OF NANCY HANKS, MOTHER OF ABRAHAM LINCOLN

County Commission of Mineral County

150 Armstrong Street Keyser, West Virginia 26726

THE COMMISSIONERS

WAYNE C. SPIGGLE, PRESIDENT Keyser, West Virginia

> **CYNTHIA L. PYLES** Keyser, West Virginia

JANICETARUE

ECRETARY'S OFFIC Piedmont, West Virginia COMMISSION PUBLIC [17] SERVIC

MICHAEL C. BLAND, COUNTY COORDINATOR

PHONE: (304) 788-5921 (301) 777-0602 FAX: (304) 788-0768 (304) 788-0568 TDD:

March 9, 2010

Ms. Sandra Squire, Director Executive Secretary Division WV Public Service Commission P.O. Box 812 Charleston, WV 25323

> Re: Case Number: 09-0871-T-PC Transfer of Verizon's Local Exchange and Long Distance Business in West Virginia to Frontier Communications

Dear Ms. Squire:

At our regular meeting on December 8, 2009, company representatives of Verizon and Frontier and representatives of Verizon employees appeared before the Commission to state their case with expertise in regard to the benefits of the referenced transaction. The meeting was friendly and all parties were forceful in their arguments. In the end, this Commission was not persuaded that the proposed transfer is in the best interest of the public. This fact was emphasized when we learned that the fiber now being installed in our county would not provide an upgrade in service and is being installed to simply separate Verizon's West Virginia service area. Further, it was explained that the County would be limited to a broadband service speed of one megabyte for the foreseeable future.

Our Communication Infrastructure Committee was also present and pressed the issue of the need for much more rapid access to broadband services. The Committee and the Commission were perplexed by the assertion that one megabyte is better than nothing.

It is our hope to work with companies that will assist us to provide county-wide affordable access to broadband services sufficiently rapid to attract new business to our community.

Ms. Sandra Squire March 9, 2010 Page 2 of 2

We appreciate your consideration of this matter.

Yours truly,

Wayne C. Spiggle, President

Cynthia L. Pyles, Commissioner

Janice La Rue

Janice LaRue, Commissioner

WCS-CLP-JL/rlb

04-0871-T-PC V

Office of Technology and Communications

RECEIVED

1 Letter of Command

Thomas W. Zielinsky 102 North Court Street New Cumberland, WV 26047 Phone: 304-564-3311 Ext. 294 twz7455@comcast.net

January 8, 2010

Mr. Michael A. Albert, Chairman

West Wirgin Public Service Commission

201 Brooks Street Charleston, WV 25301

Dear Chairman Albert,

I am the technology and communications director for the Hancock County Commission. In 2008 the Hancock County Commission allocated funds to completely install new radio communication equipment throughout the county for all public service agencies. The system is tied together by Verizon T1 lines back to the E-911 Center.

Since before the official commissioning of the system, we experienced problems with T1 line failures at our Route 208 Tower site in the northern part of the county. This tower houses the communication equipment for the Sheriff and five (5) County Fire Departments. I've included an attachment showing the number of failed occurrences at that site. When this site tower fails the E-911 Center cannot communicate with any department or field units in that area.

Verizon has failed in providing customer service in a timely manner when this T1 line fails. It has taken at a minimum 8 hours or more to find and resolve their problem. This on going poor response has been totally unacceptable but Verizon has not done anything to assume responsibility, even after repeated attempts to get direct 800 numbers to expedite service calls. Only after a letter was sent from our Prosecuting Attorney did Verizon finally attempt to rectify the situation by re-engineering the problem area. Although we have not experienced any failures since the re-engineering work was done, it doesn't provide us or the field responders with any level of confidence that the problem has actually been fully repaired; only time will tell. This communication tower site is the only life-line these field responders have; there is no backup to rely on.

It is my hope that the Public Service Commission considers postponing their decision on the upcoming merger between Verizon and Frontier Communications, at least delaying a decision until more answers can be obtained. Answers to questions like; Is Frontier certified for handling 911 ANI/ALI circuits? What is the response time to 911 Centers? Where is the closest service technician located in our area? What is the response time to handle T1 and radio circuit

Office of Technology and Communications

problems into a 911 Center as part of an overall communication network for public service agencies?

With the extremely poor response by Verizon, I dread what the response would be by Frontier, which is smaller in size than Verizon and what type of cooperation can we expect when a problem is reported.

On behalf of the Hancock County Commission I am submitting this letter for your consideration before a final decision is made on the merger. I believe the Public Service Commission is scheduled to make a ruling on Monday, January 11, 2009.

If you have any question regarding this letter, please contact me as soon as possible.

Sincerely,

/Thomas W. Zielinsky/

Thomas W. Zielinsky

cc: Jim Davis, Prosecuting Attorney Hancock County
Commissioners – Mike Swartzmiller, President, Jeff Davis, Dan Greathouse
Tracy Lemley – Hancock County E-911 Director
file
attachment

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W VA PUBLIC SERVICE

COMMISSION

SECRETARY'S OFFICE

Office of Technology and Communications

Route 208 Tower Site Problems

Date	Problem	Responsible Vendor
5/18/08	T1 Line Failure	Verizon
5/20/08	T1 Line Failure	Verizon
7/4/08	T1 Line Failure	Verizon
7/25/08	T1 Line Failure	Verizon
7/27/08	T1 Line Failure	Verizon
8/6/08	T1 Line Failure	Verizon
11/23/08	T1 Line Failure	Verizon
12/24/08	T1 Line Failure	Verizon
	8 T1 Line Failures in 2008	
5/21/09	T1 Line Failure	Verizon
8/24/09	Both Fire and Sheriff repeaters dead. Lightning	Lauttamus
	Strike fried power strip.	
8/31/09	T1 Line Failure	Verizon
9/28/09	T1 Line Failure	Verizon
10/5/09	Wiring Pedestal at 208 eaten away by mice – had to	Verizon – Re-engineer
	re-engineer the pedestal and	Pedestal and T1 Circuit
11/18/09	New Pedestal and T1 placed into service	Verizon
11/18/09	Cross talk between Fire and Sheriff – checked	Lauttamus
	equipment nothing found – dispatch provided 2	
	more tests, everything worked fine.	
	4 T1 Line Failures in 2009	
	Total 12 Outages	
1/2/10	County Fire No Tones – Found Fire repeater	Lauttamus
1,2110	processor down – reset, came back, could be	
	temperature related	
1/4/10	County Fire No Tones – Found Fire repeater main	Lauttamus
	circuit breaker tripped. Space heater installed	
	earlier, installed on repeater circuit causing circuit	
	breaker to trip	

1 Protest Original Previously Acknowledged V

Address Correspondence to:

200 JACKSON STREET • ROOM 403

Marion County Commission

RANDY J. ELLIOTT Commissioner and President

WAYNE A. STUTLER Commissioner

BURLEY "BUTCH" TENNANT, JR. Commissioner

January 12, 2010

09-0871-T-PC

Ms Sandra Squire, Executive Secretary West Virginia Public Service Commission 210 Brooks Street Charleston, West Virginia 25301

Dear Secretary Squire:



FAIRMONT, WEST VIRGINIA 26554 (304) 367-5400 FAX (304) 367-5431

As you are aware, Verizon's proposed transfer of its local exchange and long distance business in West Virginia to Frontier Communications potentially threatens West Virginia's economic future by placing our phone and internet service in the hands of a financially questionable company that may not be able to keep up with growth needs.

As elected officials, we are extremely concerned that whatever company owns and operates the telecommunications assets of our state has sufficient resources, both human and financial, to invest in modernizing the network at a pace that will meet the rapidly evolving needs or residents, businesses and institutions throughout West Virginia.

We hope that in this process the Public Service Commission is sure that the network is capable of delivering all services, including broadband, throughout West Virginia. We all must be ensured that our citizens have affordable access to the digital economy and basic local services that some of our citizens rely on.

We have serious concerns regarding the risks associated with the transaction, in particular the large amount of debt that Frontier will incur to pay Verizon while it simultaneously plans to cut operating expenses by \$500 million per year.

We are also concerned that landline networks which our citizens have paid for over many decades and grown to rely on for basic living and economic activities, are being eliminated.

Lastly, we hope that this transaction is only approved if is proven to be for the good of the general public and all concerns raised are addressed in a manner that protects the interests of our state and its citizens. We believe that it is not worth the risk to approve this transaction because of the inherent dangers that outweigh any public interest benefits and urge the Commission not to approve the sale.

Sincerely,

The Marion County Commission

Randy J. Elliott, President

Wayne A. Stutler, Commissioner

Burley "Batch" Tennant, Commissioner

2010 JAN 114 A 10:

CABELL COUNTY COMMISSION



SUITE 300 – 750 5TH AVENUE CABELL COUNTY COURTHOUSE HUNTINGTON, WEST VIRGINIA 25701-2072 415

COMMISSIONERS

BOB BAILEY W. SCOTT BIAS 304 - 526 - 8637 304 - 526 - 8635

NANCY CARTMILL

304 - 526 - 8638

December 10, 2009

TELEPHONE

EXECUTIVE OFFICE 304 - 526 - 8634

FAX 304 - 526 - 8648

TDD 204 - 526 - 8682

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Public Service Commission 201 Brooks Street Charleston, West Virginia 25301

Re:

Case No. 09-0871-T-PC

Transfer of Verizon local exchange and long distance business in West Virginia to Frontier Communications

Dear Commissioners:

We are writing in reference to the proposed transfer of control of Verizon's landline business in West Virginia, including in Cabell County, to Frontier Communications.

While the promised addition of thirty employees at a call center in Charleston is needed, it is important that the PSC address the concern that Verizon currently does not have adequate personnel to respond to service calls. We have received many complaints regarding service; therefore, the Cabell County Commission would request that the Public Service Commission do its best to insure that phone service provided to the citizens of West Virginia after the transfer will be better than it is now. We also encourage the Public Service Commission to require Frontier to provide 911 services that are as good or better than provided to our county now by Verizon.

We have been assured by representatives of Verizon and Frontier that employees will be treated fairly in this transaction. We ask that the Public Service Commission make sure that this actually occurs.

Respectfully,

Nancy Cartmill, President

Bob Bailey, Commissioner

W. Scott Bias, Commissioner

W Scott Bias

 \checkmark

STATE OF WEST VIRGINIA

IN THE COUNTY OF NICHOLAS

IN THE COUNTY COMMISSION, THEREOF

RESOLUTION

Subject:

CASE NO: 090871-T-P-C

BE IT RESOLVED, by the County Commission of Nicholas County, State of West Virginia that in the matter concerning the sale of Verizon to Frontier, that the Nicholas County Commission recognizes that all parties have a slant to what they want and the truth lies somewhere in the middle. One side wants the sale and the money, one side wants the business and the other side wants the job and retirement security. The Nicholas County Commission would urge the Public Service Commission of West Virginia for its due diligence in order to ensure what's best for the employees and for the State of West Virginia.

Entered this 18 day of December 2009.

NICHOLAS COUNTY COMMISSION

Spurgeon Hinkle, President

Birl O'Dell, Commissioner

Yancy Short, M.D., Commissioner

W VA PUBLIC SERVICE COMMISSION

SECEIVED

DIANA N. CROMLEY, Clerk POINT PLEASANT, WV



POINT PLEASANT, WV

ROBERT C. BAIRD, Commissioner GALLIPOLIS FERRY, WV

THE COUNTY COMMISSION OF MASON COUNTY COURTHOUSE - 200 SIXTH STREET POINT PLEASANT. WEST VIRGINIA 25550

PHONE (304) 675-1110 FAX (304) 675-4982

December 3, 2009

Ms. Sandra Squire Executive Secretary Public Service Commission 201 Brooks Street Charleston WV 25301

RE: Proposed sale of Verizon to Frontier

Dear Ms. Squire:

The Mason County Commission recently was asked by the Communications Workers of America (CWA) to pass a resolution opposing the proposed sale of Verizon landlines to Frontier Communications. We voted on November 19, 2009 to send this letter rather than pass the resolution.

The proposed transaction between Frontier and Verizon involves two privately held companies, which this commission has no jurisdiction over. Furthermore, it is the PSC's role - not this commission's - to review the transaction and approve it.

We are asking the PSC to review this transaction very carefully and make the best decision possible for Mason County and for all of West Virginia. As you know, broadband is a particular need here in our county. Also, preserving Verizon jobs should be a priority given our current economy.



Thank you for your time and efforts as you consider the interests of all parties in the pending transaction between Verizon and Frontier Communications.

Sincerely,

Miles S. Epling, President

Rick L. Handley, Commissioner

Robert C. Baird, Commissioner

MSE/RLH./RCB:kdh



Roane County Commission

200 Main Street

Spencer, West Virginia 25276

Phone: 304-927-0078 Fax: 304-927-0079



David F. Boothe, President

Rodney D. Cox

John A. Greathouse

December 11, 2009

Public Service Commission of West Virginia Attn: Michael A. Albert, Chairman 201 Brooks Street Charleston, WV 25323

Honorable Michael A. Albert,

As you know. Verizon has proposed the sale of its landline operations in West Virginia. along with other states, to Frontier Communications. West Virginia has the largest number of customers who will be impacted by the proposed sale, as will the majority of Roane County residents.

As a County Commission, our first priority is the citizens of the Roane County and our concerns about the proposed sale are expressed below.

First and foremost are jobs, especially during the current economic times. Will current employees remain employed, and if so, for how long? Will jobs be outsourced or contracted out, to the detriment of West Virginia employees and their families? Long term, will employees be better off if they were employed by Frontier or Verizon?

Secondly is the issue of high-speed internet access to Roane County residents. Will the sale improve the current situation? In rural areas, consumers are paying dearly for satellite internet service, because alternative high-speed internet service is not available. Will the sale remedy this situation, or make it worse? Is DSL technology the answer?

Lastly, we are concerned about the service to the consumer. Currently phone line problems are taking a week or longer to be repaired. Will this improve with the sale, or are there issues that could make it worse if the sale goes through? In Roane County, large numbers of senior citizens rely on their landline phone service as a lifeline. Will services continue, worsen or improve? Will local employees service the customers, or will consumers have to wait days for repairs?

Until all of these questions are answered and assurances made that jobs, technology and service will not deteriorate with this sale, we urge you and your department to take your time during the review process to allow for a greater understanding of the transaction and all of its potential effects on the residents of Roane County and the State of West Virginia.

Sincerely,

David F. Boothe, President **Roane County Commission**

cc: Delinda Johnson, CWA Joe Long, Verizon Mike Simms, Frontier

Charles R. Murray
President



Robert L. Gunnoe Jr. Robert E. Lowe, Jr.

WIRT COUNTY COMMISSION

P.O. Box 53 Elizabeth, WV 26143

Phone: 304-275-4271 Fax: 304-275-3418

October 20, 2009

OCT 25 P 1: 09

Protest Original (s)

Ms. Sandra Squire

Executive Secretary

Public Service Commission of West Virginia
210 Brooks Street

Charleston, WV 25301

In Re: Case Number 09-0871-T-PC, Transfer of Verizon's local exchange and long distance business in West Virginia to Frontier Communications.

Dear Executive Secretary Squire:

Verizon's proposed transfer of its local exchange and long distance business in West Virginia to Frontier Communications threatens West Virginia's economic future by placing our phone and Internet service in the hands of a financially shaky company that won't be able to keep up with our State's growing needs.

As elected officials, we are especially concerned that whatever company owns and operates the telecommunications assets of our state has sufficient resources, both human and financial, to invest businesses and institutions throughout West Virginia.

The Public Service Commission must ensure that the network has the ability to deliver technology-advanced services, including broadband, throughout West Virginia. We need a strong partner as we work to connect all of the citizens of the state to the digital economy. At the same time, it is also important to ensure that our most vulnerable citizens who rely on basic local service as a lifeline have affordable access to that service.

There are serious concerns regarding the risks associated with the transaction, in particular the large amount of debt that Frontier will incur to pay Verizon while it simultaneously plans to cut operating expenses by \$500 million a year.

Our state must not be left behind as large, regulated telecommunications companies attempt to divest themselves of the landline networks-networks that our citizens have paid for over many decades, and upon which they relay for basic living and economic activities. Verizon sold its landlines in northern New England in a similar deal to FairPoint Communications. Despite many promises for an improved network, FairPoint is now teetering on the brink of bankruptcy and service quality there has deteriorated.

In the end, the Verizon-Frontier transaction must be for the public good, and all of the serious concerns raised must be addressed in a way that protects the interest of our state and its citizens. West Virginia will be better off with Verizon than it will with Frontier.

We strongly believe that it is not worth the risk to approve this transaction because the dangers outweigh any purported public interest benefits. We urge the Commission not to approve the sale.

Very truly yours,

ROBERT L. GUNNOE JB

ROBERT E. LOWE JR.

CHARLES R. MURRAY

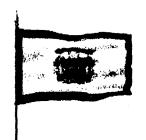
President

OCT 26 P 1: 09



Monroe County Commission

PO Box 350
216 Main Street
Union, WV 24983
http://www.monroecountywv.net



Joyce Pritt, President Shane Ashley Bill Miller Donald J. Evans, Clerk Phone: (304) 772-3096 Facsimile: (304) 772-4191

Sandra Squire, Executive Director Public Service Commission of WV 201 Brooks Street Charleston, WV 25305

November 13, 2009

RE: Proposed Sale of Verizon to Frontier

Dear Ms. Squire,

The Monroe County Commission is writing to you today to advise you that we have serious concerns about Verizon selling its West Virginia landlines to Frontier.

We have been told that most regulatory experts have said that Frontier does not have the financial or operational capacity to improve service quality or expand access to high speed internet. Monroe County is a very rural community and phone service as well as access to high speed access is very important to our constituents.

An individual from a county near us has advised us that Frontier serves their entire county and the service is very poor. He said he hoped Monroe County would never have to experience what the citizens of this particular county have experienced with Frontier.

We believe the Public Service Commission of West Virginia should take whatever means necessary and available to assure the residents of this state that their telecommunication service will not decline. We must continue to move forward with our technological advances in telecommunications and we, as citizens of this great state, must rely on the Public Service Commission to see that we keep moving in the right direction.

Sincerely.

ovce Pritt. President

Monroe County Commission

This letter was unanimously approved by the Monroe County Commission at a meeting held by said Commission on the 4th day of November 2009. The County Commission authorized Joyce Pritt, President of the County Commission to sign the letter on behalf of the Commission.

Office of the County Commission of Wood County, West Virginia

Commissioners
Rick Modesitt
David Blair Couch
Wayne Dunn



No. 1 Court Square Suite 203 Parkersburg, WV 26101 Phone 304-424-1984

November 2, 2009

CA-0871-7-PC

Ms. Sandra Squire Executive Secretary Public Service Commission 201 Brooks Street Charleston WV 25301

Re: Proposed sale of Verizon to Frontier

Dear Ms. Squire:

Most recently the Wood County Commission was approached by current employees of Verizon who expressed concerns over the proposed sale to Frontier.

The Wood County Commission understands and respects the free market system, thus allowing businesses to sell their product, and in this case, business within West Virginia.

There are a few areas which we hope the Public Service Commission will keep in mind when making a decision on this sale.

- We ask that you recognize the importance of the 911 mapping service conducted by the phone company in cooperation with local 911 call centers. We feel that this should be retained in a West Virginia location.
- We are concerned about the possible impact or loss of jobs that might occur, if jobs are consolidated and/or taken out of state. Obviously, we prefer that West Virginia workers feel comfortable in that their jobs will be secure.
- Customer Service. Again, we would encourage Frontier to maintain a physical presence within West Virginia and to continue to utilize the West Virginia workforce.

Marty Seufer, County Administrator • Ph. 304-424-1976 • Fax 304-424-0194 Regular terms of the Commission First Thursday in January, April, July and October Regular sessions Monday and Thursday 9:30am to 12 noon.

• Lastly, we would encourage a continued commitment to upgrading equipment and technology for the customers within West Virginia.

We believe in West Virginia workers! We want to feel confident that any new owner of the Verizon company within West Virginia will continue to utilize our West Virginia workforce and that the citizens/customers of West Virginia be given the best product and service available to any other state.

We wish to thank you for your time and efforts as you address this important issue.

Sincerely,

THE COUNTY COMMISSION OF WOOD COUNTY

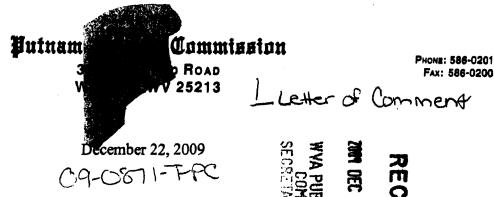
Rick Modesitt, President

David Blair Couch, Commissioner

Wayne Dunn, Commissioner

WCC:ah

Commissioners
Stephen A. Andes
R. Joseph Haynes
Gary O. Tillis



Sandra Squire, Executive Secretary West Virginia Public Service Commission 201 Brooks Street Charleston, WV 25301

Dear Ms. Squire:

On December 8, 2009, the Putnam County Commission heard arguments from representatives of the Communications Workers of America, Verizon and Frontier Communications regarding the proposed sale of Verizon's West Virginia land-line operations to Frontier Communications. Both sides did a fine job of presenting their side of the issue.

We as a local governing body did not take any action on the issue. We did not have the time, expertise or information to reach a proper conclusion as to the merits of the sale. We also have full faith in the ability of the Public Service Commissioners to reach a just and appropriate decision in the matter for the people of West Virginia.

We would, however, wish to emphasize the extreme importance the issue has with Putnam County residents and taxpayers who utilize Verizon services, are Verizon ratepayers, Verizon employees, current and future local business owners, members of the educational community, families and students. It is of utmost importance that we ensure the state's people that the level of commitment to our great state is adequate to meet the needs of our people in this time of ever growing needs for high quality communication services.

It is for those reasons therefore that we write this letter to show you not only our concern and recognition of this as a very important and far-reaching judgment, but to affirm our confidence in the Commissioners of the Public Service Commission in reaching a conclusion that will best serve the people of West Virginia.

Respectfully.

Gary O. Tillis, President

R. Joseph Haynes, Commissioner

Stephen A. Andes, Commissioner



Commissioner Joe Pitts

The Jackson County Commission

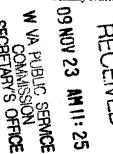
Jackson County Courthouse Ripley, West Virginia 25271 Phone (304) 373-2220 Fax (304) 373-0245

> Commissioner Donald G. Stephens

November 19, 2009



Commissioner Tommy Nutter



Public Service Commission of WV 201 Brooks Street Charleston, WV 25301

Re:

Case Number: <u>09-0871-T-PC</u>, Transfer of Verizon's local exchange and long distance business in West Virginia to Frontier Communications

Dear Members:

We are writing in reference to the Verizon and Frontier Communications proposed exchange of various services in Jackson County and other areas of West Virginia.

The Jackson County Commission would request that the Public Service Commission do its best to insure that the service will continue to be as good or better to the citizens of West Virginia as it is now. We are also encouraging the Public Service Commission to research and do their best to guarantee that Frontier will provide as good of service to our 911 system that is currently being provided by Verizon. We have been insured by representatives of Verizon and Frontier that the employees will be treated fairly with this transaction.

WV Public Service Commission November 19, 2009 Page 2

If additional input is needed from our Commission, please feel free to contact us.

Sincerely,

PHE JACKSON COUNTY COMMISSION

Donald G. Stephens, President

Joe Pitts, Commissioner

Tommy Nutter, Commissioner

JCC:DGS:slg

cc: Anekia Greiner, Communications Workers of America

Joe Long, Verizon

Consultant B. Jack Gregg

MILES S. EPLING, President POINT PLEASANT, WV

DIANA N. CROMLEY, Clerk POINT PLEASANT, WV



PICK L. HANDLEY, Commissioner POINT PLEASANT, WV

ROBERT C. BAIRD, Commissioner GALLIPOLIS FERRY, WV

THE COUNTY COMMISSION OF MASON COUNTY COURTHOUSE - 200 SIXTH STREET POINT PLEASANT, WEST VIRGINIA 25550

PHONE (304) 675-1110 FAX (304) 675-4982

December 3, 2009

PECEIVED

09 DEC -8 PM 12: 39

W VA PUBLIC SERVICE

COMMISSION

SECRETARY'S DEFICE

Ms. Sandra Squire
Executive Secretary
Public Service Commission
201 Brooks Street
Charleston WV 25301

09-0871-T-PC

RE: Proposed sale of Verizon to Frontier

Dear Ms. Squire:

The Mason County Commission recently was asked by the Communications Workers of America (CWA) to pass a resolution opposing the proposed sale of Verizon landlines to Frontier Communications. We voted on November 19, 2009 to send this letter rather than pass the resolution.

The proposed transaction between Frontier and Verizon involves two privately held companies, which this commission has no jurisdiction over. Furthermore, it is the PSC's role - not this commission's - to review the transaction and approve it.

We are asking the PSC to review this transaction very carefully and make the best decision possible for Mason County and for all of West Virginia. As you know, broadband is a particular need here in our county. Also, preserving Verizon jobs should be a priority given our current economy.



Ms. Sandra Squire December 3, 2009 Page 2

Thank you for your time and efforts as you consider the interests of all parties in the pending transaction between Verizon and Frontier Communications.

Sincerely,

Miles S. Epling, President

Rick L. Handley, Commissioner

Robert C. Baird, Commissioner

MSE/RLH./RCB:kdh



Lonnie R. Mullins

President

Jerry E. Berry

Commissioner

Bill Lightner

Commissioner

Ms. Sandra Squire Executive Secretary Public Service Commission 201 Brooks Street Charleston, WV 25301

Summers Country Commission

120 Ballengee Street • Post Office Box 97 • Hinton, WV 25951

Telephone: (304) 466-7100 • Fax (304) 466-7146

2 Letters of Comment

Mary E. Merritt Clerk

December 7, 2009

N VA PUBLIC SERVICE COMMISSION SECRETARY'S OFFICE

AUEL -8 DM IO.

09-0871-T-PC

Re: Proposed sale of Verizon to Frontier

Dear Ms. Squire:

The Summers County Commission recently was asked by the Communications Workers of America (CWA) to pass a resolution opposing the proposed sale of Verizon landlines to Frontier Communications. We voted on November 15, 2009, to *not adopt* CWA's proposed resolution.

The proposed transaction between Frontier and Verizon involves two privately held companies, which this commission has no jurisdiction over. Furthermore, it is the PCS's Role - not this commission's - to review the transaction and approve it.

However, we wish to go on record with the following:

We are mindful of the good jobs the Verizon provides today and encourage Frontier to continue to utilize West Virginia's strong workforce to the fullest.

We wish for Frontier to provide the best possible customer service to Summers County residents.

We need more broadband in Summers County and ask the PSC to pay particular heed to whether or not Frontier can deliver a high speed Internet service in the large portions of Summers County that are currently unserved by any provider.

Thank you for your time and efforts as you consider the interests of all parties in the pending transaction between Verizon and Frontier Communications.

Sincerely

Lonnie R. Mullins, President Summers County Commission

Jerry E. Berry Commissioner Bill Lightner Commissioner

Bill Lightner

"Building a healthy, livable, prosperous, well-governed and unified Summers County"

09-0871-T-PC

Randolph County Commission



Commissioners

Julia L. P. Elbon

RECEIVED
2009 DEC 22 PM 3
W VA PUBLIC SERVI
COMMISSION
SECRETARY'S OFFI
Michael

Chris See December 17, 2009

Chairman Michael A. Albert WV Public Service Commission 201 Brooks Street Charleston, WV 25301

Dear Chairman Albert:

On November 19, 2009 representatives from the Communications Workers of America Local 2007, Frontier Communications and Verizon appeared before The Randolph County Commission to explain the pro's and con's of the proposed sale of Verizon to Frontier.

Representatives from the above mentioned groups provided detailed and in depth information on how the proposed sale would affect the Citizens of Randolph County and the State of West Virginia.

By copy of this letter, The Randolph County Commission respectfully request's that The Public Service Commission takes your time in conducting the review process to allow for a greater understanding of the transaction and all the potential affects on Residents of Randolph County and The State of West Virginia.

Thank you for your attention to this matter.

Sincerely,

Michael M. Taylor, President Randolph County Commission

Chris See

Randolph County Commission

Julia L. P. Elbon

Randolph County Commission

Letters from elected officials to the Public Service Commission

(as of March 17, 2010)

West Virginia Senators who have written "protest" letters opposing the sale

Sen. H. Truman Chafin
Sen. William R. Laird IV
Sen. Randy White
Sen. Douglas Facemire
Sen. John Unger
Sen. Jack Yost

West Virginia Delegates who have written "protest" letters opposing the sale

1,900 011 9.1114 2 010 9		The same
Del. Sam Argento	Del. Bill Hamilton	Del. Dave Pethtel
Del. Tom Azinger	Del. Barbara Hatfield	Del. Linda Goode Phillips
Del. Larry Barker	✓Del. Mark Hunt	✓Del. Daniel Poling
Del. Brent Boggs	└Ðel. Tal Hutchins	Del. Mary Poling
Del. Bonnie Brown	∠ Del. Richard J. Iaquinta	Del. Meshea Poore
Del. Greg Butcher	└Del. Orphy Klempa	-Del. Ralph Rodighiero
Del. Samuel Cann	← Del . Steven Kominar	→Del. Ruth Rowan
Del. Ray Canterbury	Del. Tiffany E. Lawrence	Let. Stan Shaver
Del. Mike Caputo	Del. Linda Longstreth	Del. Alex Shook
Del. Kevin Craig	LDel. Tom Louisos	Del. Doug Skaff, Jr.
Del. Gerald Crosier	Del. Virginia Mahan	-Del. Sharon Spencer
Del. Walter E. Duke	←Del. Tim Manchin	Del. Margaret Staggers
Del. Jeff Eldridge	Del. Michael Manypenny	Del. Dale Stephens
✓Del. John Ellem	Del. Charlene Marshall	Del. Josh Stowers
∠Del. Timothy Ennis	Del. Dale Martin	Del. Sally Susman
→ Del. Michael Ferro	∠Bel. Pat McGeehan	Del. Joe Talbott
Del. Barbara Fleischauer	Del. Clif Moore	'Del. Scott Varner
Del. Ron Fragale	∠Del. Jim Morgan	Del. David Walker
✓ Del. John Frazier	Del. Rick Moye	∠De l. Danny Wells
Del. Roy Givens	∠Del. Brady R. Paxton	Del. Larry Williams
Del. Nancy Guthrie	Del. Don Perdue	Del. William R. Wooton
∟Del. Daniel J. Hall	Del. Dave Perry	miley
		, "

West Virginia Senators who have written "comment" letters concerning the sale

Sen. Edwin J. Bowman
Sen. Jeffrey Kessler
Sen. Larry J. Edgell
Sen. Joseph M. Minard
Sen. Ron Stollings
Sen. Michael Oliverio II
Sen. Mike Green
Sen. Corey Polumbo

West Virginia Delegates who have written "comment" letters concerning the sale

Del. Carol Miller
Del. Margaret Donaldson Smith
Del. Del. Doug Reynolds

West Virginia Senators who have written "support" letters concerning the sale

Sen. Clark Barnes Sen. Brooks McCabe, Jr.

West Virginia Delegates who have written "support" letters concerning the sale

Del. Troy Andes Del. Daryl Cowles

Allies/Others

Lafry Conley, Mayor, Town of Belle

Martin Howe, City Manager, City of Clarksburg

Lashua Allman, Mayor, City of Glenville

Richard Stonestreet, District 4-D, Kanawha County Democrat Committee

Norris Light, Chairman, Kanawha County Democrat Party

Naomi F. Jaynes, Executive Committee, Kanawha County Democrat Party

MARP

Carol Hess

Donna Jones

WV Association For Justice

WV Alliance For Retired Americans

Nancy J. McGowan

Archie & Ruth Chestnut

Norma Bowen

Janet Duffield

Gary Spencer

Debra J. Parsons

WV Troopers Association

*Community of Given, WV

✓ SOAR

Alex Melnik

Margaret Melnik

Jane Newbanks

Allan Grant

Virginia Moles

Ruth Seacrist

Merri Morgan

Dorothy J. Southern

Janice Lobo

Bob Widener

Pauline Widener

- Russell Raines

Michael A. Bradley

Amy Bradley

Mary Raines

Michael D. Bradley

Vickie L. Coty

Laverne F. Bass

Francis Wisiglowski

WV AFL-CIO

Professional Firefighters of WV

WV Citizens Action Group

West Virginians For Affordable Health Care

National Association of Social Workers



Beckley-Raleigh County Chamber of Commerce

245 North Kanawha Street, Beckley, West Virginia 25801 1-877-987-3847 - 304-252-7328 - fax: 304-252-7373 www.brecc.com - chamber@brecc.com

____Support Original (s)

2010 Officers

Chairman Charles Houck

January 11, 2010

Chairman-Elect Chris Hall The Honorable Michael A. Albert Chairman, Public Service Commission

Vice Chairman
Don Striker

201 Brooks Street Charleston, WV 25301

Treasurer Jim Songer

Re: Case Number 09-0871-T-PC

Past Chairman Gil DeLaRosa

Dear Chairman Albert:

President & CEO Ellen M. Taylor

Jason Anderson

In reference to the above-mentioned case, the Beckley-Raleigh County Chamber of Commerce supports the right of companies to reorganize, merge, and change their structure and ownership pursuant to current business economic conditions and

trends.

Directors

Bill Baker
Mick Bates
Karen Bowling
Tom Cochran
Elmer Coppoolse
Woody Duba
Doug Ernest
Victor Flanagan
Rachel Hopkins
Mike Jarrell
Richard Jarrell
Jeremiah Johnson
Nancy Kissinger
Dave Langford

Ken Lilly Robert Martin

Ed Mason David McChare Roy Shrewsbury Jim Silosky Debby Sizemore

Matt Stanley

Pete Torrico Mike Tyree Frank Wood In the case of regulated businesses, the Public Service Commission of West Virginia was created to evaluate utility actions to insure that investors, customers, and the general public are adequately protected.

A structured process is in place that provides for formal public input, to allow the PSC to make decisions based on factual information and we have confidence that the PSC will perform a fair and accurate evaluation of the proposed acquisition of Verizon by Frontier.

Verizon has been a good corporate citizen in Raleigh County contributing to many community projects and activities.

Sincerely,

Ellen M. Taylor, IOM

President/CEO

09-0871-T-PC





COUNTY COMMISSION OF GRANT COUNTY

5 Highland Avenue Petersburg, WV 26847 Phone: (304)257-4422 Fax: (304)257-9645

Email: gccomm@mountain.net

1 Support Original

COMMISSIONERS:

JAMES E. WILSON, JR PRESIDENT

Petersburg, West Virginia

JAMES C. COLE Petersburg, West Virginia

DOUG SWICK Petersburg, West Virginia

> ADMINISTRATOR: ED FISCHER

VA PUBLIC SERVICE
COMMISSION
SECRETARY'S OFFICE
100

Michael A. Albert Chairman Public Service Commission of West Virginia 201 Brooks Street, P. O. Box 812 Charleston, West Virginia, 25323

I would like to comment on the proposed Frontier acquisition of Verizon properties in West Virginia. I have spent 17 years in the telecommunications industry and have worked at GTE which later became Verizon for 7 years. Verizon has a long history of selling off less profitable and less dense properties as it lets them concentrate on their wireless and FIOS services in the more densely populated East Coast, Texas, California markets.

I disagree that Verizon should be able to take advantage of the 400 million tax loophole. Should Verizon be denied the chance to divest themselves of West Virginia, they will not invest another dime in infrastructure.

It makes more sense to let a motivated buyer, like Frontier, that has previous experience integrating multiple companies, acquires these landlines. This is a shrinking market, but as the acquirer, West Virginia will be the largest State in the Frontier portfolio. I think they will consider West Virginia as a place to showcase what they can do.

Our local and district management teams and local service technicians have always delivered great service and been very responsive.

I think the Frontier acquisition of Verizon phone lines in West Virginia is a real WIN-WIN for both West Virginia and Frontier and will result is additional broadband investment as part of this deal.

Ed Fischer

Grant County Administrator